



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
REGION 5
77 WEST JACKSON BOULEVARD
CHICAGO, IL 60604-3590

Date: February 23, 2005

Subject: Supplemental Sludge Lagoon and
Groundwater Sampling Report
Downers Grove Sanitary District
Ellsworth Industrial Site
Downers Grove, IL

EPA Region 5 Records Ctr.



368471

From: Bob Kay, Geologist
Remedial Response Section 4

To: Ross del Rosario
Remedial Project Manager

Ross, I've looked over the Huff and Huff Feb 2005 report on the Downers Grove Sanitary District sampling. I have a few minor comments:

1. General Comment—it appears they collected the proper number of soil samples from the proper locations at the proper depths in the proper manner and analyzed them for the proper constituents. Assuming there has been no excavation of sludge material in the past, the fact that essentially nothing was detected in the sludge and soil during the current and previous investigations indicates these sludge drying beds aren't a source of ground-water contamination.
2. Section 3—it was my understanding Huff and Huff were going to add dissolved oxygen and oxidation-reduction potential to the field parameters. It appears this was not done. Why?
3. Table 3-1—the 2004 data appears to be reasonable, however, many of these measurements indicate more variation in water levels than would be expected due to natural causes. It may be prudent to explicitly note some of this data is suspect.
4. Figure 3-4—ground-water flow directions based on this data show rely on use of a subset of the available wells, and ignoring data from others. It is likely the actual flow direction is more complicated than is indicated in this figure, and is probably indecipherable with the available wells. The text kind of implies this, but doesn't actually make the coherent statement. Why is the data from wells DG-5I and BD-4I ignored? Why is preference given to the data from DG-1I over DG-1D? Why is the data from well DG-15I ignored? Why is there no data from LD-1I? Regardless of statements in the text, as to why certain wells were given more weight than others, see no consistently applied basis for this well selection—geology, altitude of well screen—other

than to point the finger at Dyna-Gear as the source.

I hope this review has been of use to you. If you have any questions or comments feel free to call me at 6-7938.

cc. S. Padavoni